

**United States Court Of Appeals
For The First Circuit**

Nos. 15-1347; 15-1412

GOOD SAMARITAN MEDICAL CENTER,
Petitioner/Cross-Respondent,

v.

NATIONAL LABOR RELATIONS BOARD,
Respondent/Cross-Petitioner.

Nos. 15-1877; 15-1941

NATIONAL LABOR RELATIONS BOARD,
Petitioner/Cross-Respondent,

v.

1199SEIU UNITED HEALTHCARE WORKERS EAST,
Respondent/Cross-Petitioner

**RESPONDENT/CROSS-PETITIONER 1199SEIU’S ASSENTED
MOTION TO FILE CORRECTED REPLY BRIEF**

To the Honorable Judges of the
United States Court of Appeals for the First Circuit:

Respondent/Cross-Petitioner 1199SEIU-United Healthcare Workers East (“the Union”), by counsel, hereby respectfully moves for leave to file a corrected Reply Brief in this matter. The grounds for this motion are as follows:

1. On March 17, 2016, the Union filed its Reply Brief. Oral argument now is scheduled for June 9, 2016.
2. In preparing for argument, counsel became aware that in error she had cited *Sutter East Bay Hospitals v. NLRB*, 687 F.3d 424 (D.C. Cir. 2012), as a case decided by this Court; instead, the case issued from the United States Court of Appeals for the District of Columbia Circuit.

3. In order to correct this error, Union counsel has made the following revisions to the Reply Brief as filed:

- a. On page iv, in the Table of Authorities, changed *Sutter East Bay Hospitals v. N.L.R.B.*, 687 F.3d 424 (1st Cir. 2012) to *Sutter East Bay Hospitals v. N.L.R.B.*, 687 F.3d 424 (D.C. Cir. 2012);
- b. On page 11, paragraph 1, line 4, changed “this Court” to “the Court of Appeals for the D.C. Circuit,” and, following the quoted language, corrected the citation to *Sutter East Bay Hospitals* to reflect the U.S. Court of Appeals for the D.C. Circuit;
- c. On page 11, paragraph 2, line 1, changed “this Court” to “the Court;”
- d. On page 12, paragraph 1, line 1, changed “this Court” to “the Court;”
- e. On page 12, paragraph 1, line 13, changed “this Court” to “the Court;”
- f. On page 12, paragraph 2, line 1, changed “this Court’s” to “the.”

4. The corrected Reply Brief is submitted with this Motion.

5. The National Labor Relations Board and Good Samaritan Medical Center assent to the granting of this motion.

WHEREFORE, 1199SEIU-United Healthcare Workers East respectfully requests leave to file the corrected Reply Brief attached hereto.

Respectfully submitted,

1199SEIU-UNITED HEALTHCARE WORKERS
EAST,

Respondent/Cross-Petitioner,

By Its Attorneys,



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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2016, I electronically filed the foregoing with the Clerk for the Court of the United States Court of Appeals for the First Circuit by using the appellate CM/ECF system. I further certify that this document was served on the following individuals through the appellate CM/ECF system

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